

EXHIBIT 6

I, Willie D. Davis, respectfully state as follows:

I am President of All Pro Broadcasting, Inc. I am providing this Declaration in support of the proposed regulations regarding EEO enforcement.

I got into radio broadcasting in August of 1976, by buying a bankrupt radio station in Inglewood California. From there, I purchased a number of stations in cities throughout America. I currently own four stations. In 1996, I also got involved in television ownership with an interest in Quest.

Every time a broadcaster ponders the importance of FCC EEO regulations, that broadcaster knows that they are held to some particular requirement of representation of the market place. Being a minority, I truly appreciate how difficult it has been for minorities to secure employment within the broadcast industry. The value received from EEO enforcement is worth what must be endured to make sure you have employed within your station, a reflection of the audience and community you serve.

I think diversity is ever more important in today's marketplace. Competition alone does not ensure some of these qualities you would like to see. I believe the EEO regulations of the past have served the community well. An EEO program should be designed to insure diversity and to maintain a level of marketplace representation of the audience served. It is so easy for broadcasters to say, "I would be willing to hire minorities if I could find one." I think this response is an excuse for not taking the right approach and taking the necessary steps to find minority applicants. Many jobs are not advertised. As a result, people are unaware that jobs exist within the industry.

Over my 22 years in the business, I've found the FCC has tried to stimulate and motivate broadcasters to train and develop people. This is an area where EEO compliance exists in name more than substance. The problem is that there is too much lip-service being applied to training and development. There is really a shortage of good people, particularly in management and specialized areas.

I think this shortage is due to the fact that broadcasters have not accepted the responsibility of complying with EEO in a conscientious way. There is far too much time spent trying to hire-away, from one another, those minorities who have already been recruited and trained. Consistently, majority owned broadcast companies are not making the investment of time and money to hire and train minorities. Minority broadcasters have been the companies who traditionally recruit, mentor and train minorities, only to have them hired away by well-financed, majority companies.

I don't specifically subscribe to the concept of hiring quotas, but I do think there are too many blatant examples of broadcast companies that do not have a representative and diverse work force. This is because EEO violations are not pursued as a serious matter. When the FCC does act to fine and punish EEO violators, I'll bet it has been effective. However, there are a lot of broadcasters willing to take the chance that, somehow, they will escape the penalty for failing to meet EEO regulations.

Every broadcaster should be responsible for recruiting and developing a diverse group of employees, instead of using their resources to hire-away from those broadcasters that are willing to mentor and train minority applicants.

It is likely that FCC EEO requirements have positively affected job opportunities for minority applicants, but it is hard to measure. As a minority, and according to many others I've spoken to, we believe that there is still only a pseudo attempt being made, on the part of majority-owned broadcasters, to recruit and train minorities.

I know a few managers in broadcasting who started their careers in entry-level positions, with some spring-boarding from my company, All Pro Broadcasting. One of my general managers and I recently recounted the number of people, who had come through All Pro, who are now programming, in sales, and indeed, serving as general managers. I can say that I am proud of the upward-career mobility of employees within my company. My Milwaukee transaction, in 1979, was really the first minority tax

certificate transaction that took place. I have experience the true value of the minority tax certificate with respect to the number of minorities who became employed within the industry because of increased minority ownership.

The minority broadcasters were finding it very necessary, and very comfortable, to bring minorities into the industry in entry-level jobs. Because there are so few Black and Hispanic broadcast owners, we are seeing a lesser pool of available minority job applicants.

Small stations are crucial to the EEO effort, because they often hire new people looking to get entry into the industry. This hiring situation doesn't give the small station the best opportunity to hire the best people, but I think that whole process is very entrepreneurial.

The FCC has had an impact on my career in the industry. My first five transactions were driven, to some extent, by the tax certificate opportunity that provided a majority broadcaster a tax incentive to sell to a minority. I hope that this type of incentive for minority ownership will return. Without an incentive to motivate majority broadcasters to somehow work with minority broadcasters, it will just become more difficult. Securing capital and financing is still the main problem for minority broadcasters. For radio properties, and more so for television station ownership, the prices are just prohibitive.

The pursuit of equal opportunity within the broadcast industry is still far from being implemented. It is approached and toyed with, but I don't sense a conscientious effort to get it done.

What is still very real within the broadcast industry regards sales and compensation of minority broadcasters when compared to majority broadcasters. Many times, white and minority broadcasters talk about this disparity in compensation and how the marketplace will not reward minority broadcasters in the way it does majority broadcasters. This was recently borne out by a study conducted by the Justice Department. This study found that minority owners were not getting their fair share of

revenue and buying considerations from the ad agencies, or from people who purchase time.

Since deregulation, competition has driven home some obvious opportunities, to the extent that good broadcasters tend to do better, and the poor broadcasters tend to eliminate themselves. I would have no problem if this reduction of minority ownership was due to the marketplace at work, with every other component being fair. However, there hasn't been a level playing field, which hampers minority owners from being competitive.

Minority ownership now is like a double-edge sword, get through the difficulty of get financing. The first consideration of financial institutions that fund media projects, is whether a buyer has a track record and experience within the industry. The more impressive the track record, the more comfortable climate you could create within the financial community. The group becomes very small when you are trying to find enough minorities with a sufficient background in broadcasting to court the financial industry.

Absent FCC EEO involvement, I just don't see broadcasters taking on the responsibility of diversity and minority involvement, at all levels in the industry, without some pressure from the FCC to accomplish such goals. I am sad to say that because there is a marketplace phenomenon which says, "if you are serving a particular market, why wouldn't you have a work place which reflects that market?"

This statement is true to my personal knowledge and is made under penalty of perjury under the laws of the United States of America.

Executed

2/25/99

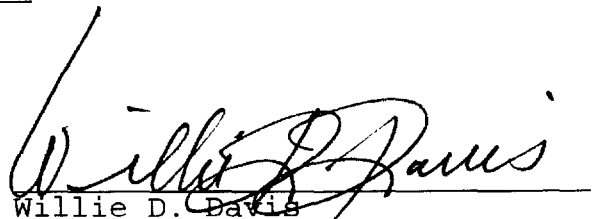

Willie D. Davis

EXHIBIT 7

Declaration of William H. Dilday

I William H. Dilday, Jr., respectfully state as follows:

I am president and CEO for a communications consultancy group which specializes in media industry turnarounds. I have worked in executive and management positions in the broadcasting industry for thirty-one years and have served as general manager of a television station in a large market. Throughout my tenure, I have maintained a commitment to minority hiring and mentoring; and have always ensured that stations which I managed complied with and exceeded EEO requirements. I wanted to make my staff reflective of the community as whole. I knew that it was just good business to employ the whole community in your workforce. When I was hired as the first black manager for a TV station in the country, here in Jackson, Mississippi, I'm quite certain that it was due to the FCC's EEO policy. I didn't seek my employment. The station owners heard about me and sought me out.

First, I would like to state that generating and retaining qualified minority applicants is not difficult. Once minorities are made aware of job opportunities they will apply for the positions. I would suspect that once you see that people want to hire you, you become interested in what they're doing. But once you think that there's no chance of you being hired, then you're not interested. In terms of retaining minorities, if they are

given proper on-the-job conditions, equal promotion and advancement opportunities and equal pay, it is not difficult. I found, with broadcast companies, that if the commitment was truly there, there's was a good strong minority population in the workforce. But the commitment has to come from the top down. And it has to be very well delineated and communicated to those in lower positions.

I have also noticed that there is a drastic difference in on the job conditions for minorities when stations have no working EEO program in force. This was my experience when I first started in broadcasting, during the initial years of EEO implementation. One particularly vivid memory occurred when I first came to Jackson. One of the older employees, P.J. Young, had been a maintenance man and delivery man at that same station for many years. I was told there was nothing else he could do. That was the extent of his ability. And yet, I came in one morning and found him running the audio board on the morning shift because the employee responsible for the board was late. It turned out that he'd been doing that off and on for ten years. (The man he was filling in for apparently had a habit of getting there late.) No one had ever thought to give him the opportunity to leave that maintenance job and to lead the audio board. P.J. had been doing this at least twice a week. He was never compensated for it. All I could do was give him a good raise which could never compensate for the indignities done to him. It was a shame that this man had such

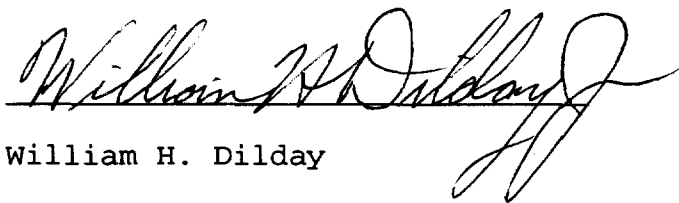
ability and was never allowed to use it. As the EEO program continues, such stories will hopefully fade from our collective memories.

Due to the nature of broadcasting, the presence of minorities and women on staffs positively influences the content, frequency and tone of programming on minority issues. This effect is partially attributable to the dynamic of the interaction: the more you and I interact, the more we learn about each other and the more tolerant we are of each other's concerns, desires, wants, needs and community. I think that when you get more minorities in staff and decision making positions, programmers and audiences began to look at minorities in a different light and a more objective fashion.

An integrated workforce also works in more direct ways by increasing the availability of employees who can cover minority issues, know what questions to ask, and put a much more balanced story on the air. In Jackson, I co-founded a local minority community affairs show that dealt with issues important to the black community. Back in Boston, I sat on the advisory board for probably the longest running black oriented program in the country, Say Brother. This was for an educational station. When I first came to Jackson, I looked around and saw that my audience was about 50% black and 50% White. In the coverage of sports, the predominantly white colleges got about 75% of the coverage, and the predominantly black colleges were only about 25%. So I just

told my staff: "we have a problem. The main school in the area is Jackson State, a predominantly black school, and yet it is getting different coverage than the others." I said I wanted to see more balanced coverage and they started to cover more. I think what we did was try to make it more balanced. We showed when something was bad and we showed when it was good. As a result of this, our ratings improved and correspondingly, so did our revenues. Doing the right thing amounted to a profitable business decision.

In conclusion, I want to emphasize that the EEO rule is a necessary component of broadcaster's public interest obligations and is needed in order to maintain and increase the capacity of members of all segments of broadcasting audiences to gain representation on the public airwaves. Without the EEO program, people tend not to look for minorities or women when they make hiring decisions. Therefore minorities and women have far less chances of gaining employment in broadcasting and of bringing the interaction and tolerance that makes for a better station and a better community.



William H. Dilday

February 26, 1999.